

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TENNESSEE**

BUFFY HALL,

Plaintiff,

v.

**CASE NO:
JURY DEMANDED**

**ALLSTATE INSURANCE COMPANY
and ALLSTATE PROPERTY AND
CASUALTY INSURANCE COMPANY,**

Defendants.

NOTICE FOR REMOVAL OF CIVIL ACTION

TO THE HONORABLE JUDGES OF THE U.S. DISTRICT COURT FOR THE
EASTERN DISTRICT OF TENNESSEE:

COMES NOW Allstate Insurance Company and Allstate Property and Casualty Insurance Company, (hereinafter "Allstate"), by its undersigned attorney, and respectfully shows this Court as follows:

1. Petitioners are defendants in the above and entitled action.
2. On May 30, 2013, the Plaintiff, Buffy Hall, commenced the above entitled action against the Defendants, Allstate Insurance Company and Allstate Property and Casualty Insurance Company, in the Circuit Court of Roane County, Tennessee. Attached hereto as Exhibit A is a copy of the Complaint, and Service of Process.
3. There have been no proceedings since the filing of the Complaint.
4. The amount in controversy in the above entitled action, exclusive of interest and cost, exceeds \$75,000.00. At the time of the commencement of this action, and at the

time of the filing of this Petition, Plaintiff alleges that she is a citizen of the State of Tennessee residing in Roane County.

5. At the time of commencement of this action and the filing of this Petition, the Petitioner, Allstate, is a corporation, duly incorporated in the State of Delaware, and is authorized to do business in the State of Tennessee and has its principal place of business in Northbrook, Illinois.

6. The above entitled action is a civil action for insurance proceeds brought by Buffy Hall. This claim is a result of a fire loss, which occurred on or about June 2, 2010 in Roane County, Tennessee, as more fully appears in the Complaint attached hereto.

7. This Court has original jurisdiction of the above entitled action pursuant to 28 U.S.C. §1332 since diversity of citizenship exists between the parties, and since Petitioner, Allstate, is not a citizen or a resident of the State of Tennessee, wherein the above entitled action is pending, removal of this action to this Court is proper pursuant to 28 U.S.C. §1441 (a), (b).

8. This petition is filed with this court within thirty (30) days after receipt of the summons and Complaint filed by the Plaintiff. Allstate was served on June 11, 2013.

WHEREFORE, PETITIONER PRAYS, that the above entitled action be removed from the Circuit Court of Roane County, Tennessee, to this Court and that Allstate be afforded a trial by jury.

Respectfully submitted,

WALDROP & NEARN, P.C.



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Gena Lewis, Esq., Attorney for Plaintiff, P.O. Box 6004, Maryville, TN 37802, by placing the same in the U.S. Mail, postage prepaid, this 9th day of July, 2013.



David M. Waldrop